Message

From: Holly Landuyt [Holly.Landuyt@tceq.texas.gov]
Sent: 10/21/2019 1:55:42 PM
To: Crawford, Dorothy [Crawford.Dorothy@epa.gov]
CC: Verhalen, Frances [verhalen.frances@epa.gov]; Belk, Ellen [Belk.Ellen@epa.gov]; Madden, Joshua [madden.joshua@epa.gov]
Subject: RE: TCEQ draft 2019 Annual Network Plan, PM topics

Great news! Thank you Dot!

From: Crawford, Dorothy <Crawford.Dorothy@epa.gov>
Sent: Monday, October 21, 2019 8:49 AM
To: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>; Belk, Ellen <Belk.Ellen@epa.gov>; Madden, Joshua <madden.joshua@epa.gov>
Subject: RE: TCEQ draft 2019 Annual Network Plan, PM topics

Thanks. Your explanation for the PM10 North Wayside monitor is sufficient for me to change my recommendation to EPA management.

Dorothy Crawford
U.S. EPA, Region 6, Air Monitoring
(214) 665-2771

> **From:** Holly Landuyt <Holly.Landuyt@tceq.texas.gov>
> **Sent:** Monday, October 21, 2019 8:37 AM
> **To:** Crawford, Dorothy <Crawford.Dorothy@epa.gov>
> **Cc:** Verhalen, Frances <verhalen.frances@epa.gov>; Belk, Ellen <Belk.Ellen@epa.gov>; Madden, Joshua <madden.joshua@epa.gov>
> **Subject:** RE: TCEQ draft 2019 Annual Network Plan, PM topics
>
> Hi Dot,
>
> I understand your recommendation for the Ascarate PM2.5 monitor. The Houston North Wayside recommendation to add continuous particulate monitoring was based on public interest (and potential environmental justice concern) in the area due to a nearby cement batch facility. The TCEQ would like to place both a PM10 and PM2.5 monitor at the nearest existing site to ensure the specific area is not exceeding federal requirements. Once we have three years of data, we will determine if the monitors need to stay.
>
> Here is a Google Earth photo of the area, I'll be in the office all week and would like the opportunity to discuss this further with you.
>
> Thank you,
> Holly

From: Crawford, Dorothy <Crawford.Dorothy@epa.gov>
Sent: Monday, October 21, 2019 8:11 AM
To: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>; Belk, Ellen <Belk.Ellen@epa.gov>; Madden, Joshua <madden.joshua@epa.gov>
Subject: RE: TCEQ draft 2019 Annual Network Plan, PM topics

Holly, Be aware I am recommending EPA not approve the discontinuation of the Ascarate site 48-141-0055 non-FEM non-NAAQS PM2.5 TEOM monitor. The PM2.5 monitor is reporting the highest concentrations of PM2.5 occurring in the El Paso area.

Also, I am recommending EPA not approve the installation of a new PM10 monitor at Wayside 48-201-0046. EPA also encourages disinvestment in the PM10 network for areas where existing data indicates no concerns with ambient air levels. Based on population and known ambient air levels, federal regulations required 2-4 sites reporting PM10 data for the Houston area. There are six sites reporting PM10 data in the area (5 NAAQS, 1 non-NAAQS).

If you want to discuss, let me know and I will set up a conference call.

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From: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>
Sent: Thursday, May 02, 2019 1:51 PM
To: Crawford, Dorothy <Crawford.Dorothy@epa.gov>

Cc: Verhalen, Frances <verhalen.frances@epa.gov>; Belk, Ellen <Belk.Ellen@epa.gov>
Subject: RE: TCEQ draft 2019 Annual Network Plan, PM topics

Hi Dot,

I'm working on answers to your comments, I'll be out all next week, so hopefully I'll be done by tomorrow.

We discontinued the Fayette County TEOM on 12/4/19, I will add this to the plan as completed as well.

Thanks!
Holly

From: Crawford, Dorothy <Crawford.Dorothy@epa.gov>
Sent: Thursday, May 2, 2019 1:36 PM
To: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>; Belk, Ellen <Belk.Ellen@epa.gov>
Subject: RE: TCEQ draft 2019 Annual Network Plan, PM topics

Side note:
Any information or background on TCEQ's decision to discontinue the Fayette Co PM2.5 monitor 48-149-0001-88502-3 on 12/4/18?

Thanks

Dorothy Crawford
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From: Crawford, Dorothy
Sent: Thursday, May 02, 2019 10:56 AM
To: Holly.Landuyt_tceq.texas.gov <Holly.Landuyt@tceq.texas.gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>; Belk, Ellen <Belk.Ellen@epa.gov>
Subject: TCEQ draft 2019 Annual Network Plan, PM topics

Holly, Some comments on the subject draft.

Wayside 48-201-0046 PM10– Request to add a Continuous FEM (see App A) PM_{10} monitor to Houston Wayside site. EPA encourages the transition from Manual to Continuous monitors in the Houston MSA to achieve more robust data, and to eliminate costs for QA Collocated monitor, lab, filter management, and shipping. EPA also encourages disinvestment in the PM10 network for areas where existing data indicates no concerns with ambient air levels. Federal regulations required 2-4 sites reporting PM10 data for the Houston area. There are six sites reporting PM10 data in the area (5 NAAQS, 1 non-NAAQS). The narrative states the new PM10 site is 'to improve population exposure coverage'. Are there other factors for why TCEQ believes a seventh site, Wayside, that provides PM_{10} ambient air measurements is warranted for the Houston area?

Suggest the narrative prior to Table 6 in the draft 2019 ANP clarify the collocation deployments were approved with the 10/19/18 EPA response letter.

Isla Blanca 48-061-2004 – EPA 10/19/18 response to 2018 ANP approved the replacement of existing non-FEM 702 TEOM monitor with FEM 209 BAM1022 monitor at the site by

12/31/19. AQS shows the TEOM still operating at the site. The EPA 3/20/19 letter approved the relocation of the site and monitor. In the draft 2019 ANP narrative prior to Table 7, TCEQ states the site will be relocated by 6/30/19. Table 7 mentions the site relocation as a pending network change but not the monitor replacement. Please clarify if TCEQ still plans to replace the existing non-FEM 702 TEOM monitor with FEM 209 BAM1022 monitor at the Isla Blanca site by 12/31/19.

Palo Alto 48-029-0676 – Table 7 indicates EPA approved the replacement of the existing non-FEM 702 TEOM monitor with FEM 209 BAM1022 monitor at the Palo Alto site. Please clarify when EPA made the approval.

Ascarate 48-141-0055 – TCEQ requests to discontinue the existing non-FEM non-NAAQS TEOM monitor at this site. The Ascarate $PM_{2.5}$ monitor is designated as an SPM and has been operating since 2010. TCEQ indicates the proposed change is 'to improve...spatial coverage and to support exceptional event analyses'. The $PM_{2.5}$ monitor at Ascarate is reporting the highest concentrations of $PM_{2.5}$ occurring in the area covered by the network in the El Paso area. Are there other factors for why this monitor should be discontinued? Also, the discussion of the discontinuation of the Ascarate TEOM monitor is associated with the installation of a BAM1022 at the Ojo site. Please clarify if the Ojo monitor installation proposal is contingent on approval of the Ascarate monitor discontinuation so we can assure our formal response letter accurately responds to the request(s).

Possible future site relocations – When available, we will need specific information about proposed new locations for the Midlothian 48-139-0016, Austin NW 48-453-0014, and Palo Alto 48-029-0676 sites.

Possible new sites – When available, we will need specific information about proposed location for site being considered for San Patricio count, i.e., Corpus or Portland-Gregory area.

Appendix B Site/Monitor list

Webberville 48-453-0021-88101-2 QA Collocated FRM monitor is shown on 12-day sampling schedule. AQS indicates 2018 was collected on 6-day schedule.

Dona Park 48-355-0034-88101-5 $PM_{2.5}$ Mass Manual monitor does not appear to be listed. Believe this is result of typo on page B-9 in 'Sampler Type' and 'AQS Monitor...' columns (speciation and CSN references).

Hinton 48-113-0069-88101-1 $PM_{2.5}$ Mass Primary monitor is shown on 3-day sampling schedule. AQS indicates 2018 was collected on daily schedule.

Hinton 48-113-0069-88101-2 $PM_{2.5}$ Mass QA Collocated monitor is shown on 12-day sampling schedule. AQS indicates 2018 was collected on 6-day schedule.

San Antonio NW 48-029-0032-88101-1 $PM_{2.5}$ Mass QA Collocated monitor is shown on 12-day sampling schedule. AQS indicates 2018 was collected on 6-day schedule.

Suggest Appendix B be revised to recognize the non-NAAQS $PM_{2.5}$ parameter (Manual monitor using Quartz filters) which is being reported from the Midlothian, Aldine, and Dona Park sites.

Suggest Appendix B be revised to recognize the non-NAAQS PM_{10} parameter which is being reported from each of the NCore sites (Hinton, Chamizal, Deer Park).

$PM_{2.5}$ Mass QA Collocation – BAM1022, FEM 209

My understanding is that if all the BAM1022 installations proposed in the draft 2019 ANP are approved and implemented there will be a total of 44 BAM1022 monitors operating in the network. Two of the 44 monitors are currently slated to be designated as QA Collocated, or non-primary, i.e., Ft Worth Calif 48-439-1053 and Huisache 48-355-0032. Leaving a possibility of up to 42 BAM1022 Primary monitors operating in the network by 12/31/20. The draft 2019 ANP

Table 6 reflects the approved plan for providing QA Collocation for FEM 209. Table 6 provides for QA Collocation up to a total of 36 BAM1022 Primary monitors operating. Please clarify what the QA Collocation plan is for the sixth BAM1022 FEM 209 QA Collocation site which will be needed when the 37th BAM1022 Primary monitor starts operating.

Appendix K PM2.5 Network

Suggest Appendix K clarify if the summaries reflect the existing network, the network with all approved changes implemented, or the network with all approved and proposed but not yet approved changes.

Suggest Appendix K Table 1 and Table 2 be revised to reflect the additional Manual $PM_{2.5}$ monitors at Midlothian, Aldine, and Dona Park which are being operated with Quartz rather than Teflon filters and reporting out non-NAAQS $PM_{2.5}$ data.

Suggest notes be added to Appendix K Table 2 to clarify: Method 185 monitors relate to PM Coarse parameter rather than $PM_{2.5}$ Mass; Methods 810-812, 826, 831, 838-842, 846, 849 relate to PM2.5 speciation rather than PM2.5 Mass; and PM2.5 Mass monitor data is used for formal or informal NAAQS comparison and to inform the public about ambient air levels.

The 'Total Existing Monitors' columns in the Appendix K $PM_{2.5}$ summaries include monitors which provide PM Coarse and $PM_{2.5}$ speciation data, in addition to monitors which provide $PM_{2.5}$ Mass data. Suggest notes be added to Appendix K Tables 1 and 2 to clarify that the 'Total Existing Monitors' columns includes monitors which are not reporting $PM_{2.5}$ Mass data and the data from these other monitors, while valuable, is not used formal or informal NAAQS comparison and to provide the public with timely information about ambient air levels (Air Now).

I understand App K Table 2 reflects the following $PM_{2.5}$ network federal regulatory requirements: Near Road, NCore, and 'Minimum Monitoring Requirements' (40 CFR 58 App D Table D-5) with associated Continuous monitoring. A Table 2 note recognizes the PM2.5 Mass QA Collocation monitor requirements and clarifies Table 2 does not include these monitors in the total. If my understanding is correct, suggest a note be added to Appendix K Table 2 to clarify that the term 'Total Required Monitors' is referring to only certain specific federal regulatory requirements but does address all federal requirements for the $PM_{2.5}$ network. There are other monitor/network federal regulatory requirements which are not reflected in Table 2, e.g., Background, Transport, and Air Now/AQI.

TCEQ operates 7 $PM_{2.5}$ speciation sites/monitors listed below. Four of the sites (Hinton, Chamizal, Deer Park, and Karnack) are supported by the EPA contract lab. Hinton, Chamizal, and Deer Park are 'Speciation Trends Network' or STN designated sites which TCEQ is required to operate, 40 CFR 58 App D sec 4.7.4. The Hinton, Chamizal, and Deer Park sites also have NCore designations which requires $PM_{2.5}$ speciation. Three of the sites (Midlothian, Aldine, and Dona Park) are optional speciation sites selected by TCEQ and supported by TCEQ contract lab. The Table 2 reflects the $PM_{2.5}$ speciation activities under the Method Codes and NCore columns.

Suggest Table 2 be revised to clarify that two monitors are operated at the Hinton and Chamizal $PM_{2.5}$ speciation sites to provide the speciation parameters being reported.

Please clarify why Hinton and Chamizal is shown as 4 NCore required monitors rather than 5. I understand NCore requires one $PM_{2.5}$ Mass Manual, one $PM_{2.5}$ Mass Continuous, two $PM_{2.5}$ Speciation, and one PM Coarse monitors. [The selection of technology could reduce this total number since a single monitor can now provide both $PM_{2.5}$ Mass and PM Coarse.] Similarly, is the existing total accurate?

Similarly, should Deer Park be shown as 7 NCore required monitors rather than 4 since all the STN monitors (i.e., CSN QA Collocated pairs) at the site are required to be operated. Similarly, is the existing total accurate?

Should Karnack be shown as 4 existing monitors rather than 3 (FRM, TEOM, SASS, URG)

Site ID	Site Name	Parameter	POC	Type	Equipment
48-113-0069	Hinton	88102...	5	SLAMS, NCORE, CSNSTN	SASS
48-113-0069	Hinton	88320...	5	SLAMS, NCORE, CSNSTN	URG
48-139-0016	Midlothian	88102...	5	SPM	2025
48-139-0016	Midlothian	88355...	5	SPM	URG
48-141-0044	Chamizal	88102...	5	SLAMS, NCORE, CSNSTN	SASS
48-141-0044	Chamizal	88320...	5	SLAMS, NCORE, CSNSTN	URG
48-201-0024	Aldine	88102...	5	SPM	2025
48-201-0024	Aldine	88355...	5	SPM	URG
48-201-1039	Deer Park	88102...	6	SLAMS, NCORE, CSNSTN	SASS
48-201-1039	Deer Park	88320...	6	SLAMS, CSN STN	URG
48-201-1039	Deer Park	88102...	7	SLAMS, NCORE, CSNSTN	SASS
48-201-1039	Deer Park	88320...	7	SLAMS, CSN STN	URG
48-203-0002	Karnack	88102...	5	SLAMS, CSN	SASS
48-203-0002	Karnack	88320...	5	SLAMS, CSN	URG
48-355-0034	Dona Park	88102...	5	SLAMS	2025
48-355-0034	Dona Park	88355...	5	SLAMS	URG

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